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June 12, 2025

VIA ECF

The Honorable Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1910
New York, NY 10007

Re: *American Federation of Government Employees, AFL-CIO, et al v. U.S. Office of
Personnel Management, et al., 25-cv-1237-DLC*

Dear Judge Cote:

Pursuant to the Court's Order dated June 9, 2025 (ECF No. 122), and in accordance with the Court's Opinion and Order granting Plaintiffs' motion for a preliminary injunction (ECF No. 121), Plaintiffs hereby submit their proposed terms for the injunction. The parties have met and conferred regarding the terms of the injunction. Plaintiffs' proposal includes several terms on which the parties agree and other terms that Plaintiffs revised based on discussion with Defendants' counsel to narrow the scope of the proposed injunction, clarify its provisions, and allow more time for Defendants to certify their compliance.

Respectfully submitted,

/s/ Rhett O. Millsaps II

Counsel for Plaintiffs

cc: All Counsel of Record (via ECF)